

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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EILEEN GRADY, )  
Plaintiff, )  
v. )  
WAREHAM POLICE DEPARTMENT, ) C.A. NO. 05-10097-JGD  
TOWN OF WAREHAM, )  
THOMAS JOYCE (individually), and )  
MICHAEL J. HARTMAN (individually), )  
Defendants. )  
\_\_\_\_\_  
)

**PLAINTIFF'S MOTION TO COMPEL DEFENDANTS  
TO PRODUCE DOCUMENTS**

Pursuant to Fed. R. Civ. P. 26(b) and Local Rule 37.1(B), Plaintiff Eileen Grady ("Grady") hereby moves the Court to compel Defendants Wareham Police Department and Town of Wareham to produce documents responsive Requests 7, 8, 9 and 10 of Plaintiff's First Request For Production Of Documents. In support of this motion, Plaintiff files herewith Plaintiff's Memorandum In Support Of Her Motion To Compel Defendants To Produce Documents.

**COMPLIANCE WITH LOCAL RULE 37.1(A)**

The provisions of Rule 37.1(A) were complied with. Counsel (Barbara Robb, Esq. on behalf of Sergeant Grady and Deborah Ecker, Esq. on behalf of the Defendants) conferred over the telephone three times (on August 30, 2005, October 12, 2005 and October 26, 2005) for approximately twenty minutes each time in good faith to narrow the areas of disagreement to the greatest possible extent.

REQUEST FOR A HEARING

Plaintiff requests a hearing on this motion.

Respectfully Submitted,

EILEEN GRADY  
By her attorneys,

/s/ Barbara A. Robb  
Lawrence J. Casey (BBO #555766)  
Barbara A. Robb (BBO #639976)  
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DATED: October 27, 2005